IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF ALABAMA MOBILE DIVISION

AUDREY COX,)
Plaintiff,) CASE NO.: 1:22-CV-00161
v.))
SPRINGHILL COLLEGE, VASSIL)
KOKALI, J.K. ANDERSON, KENNETH ENGLAND, E. JOSEPH)
LEE II, AND KEVIN W. ABEL,)
Defendants.)

NOTICE OF TAKING VIDEO DEPOSITION OF DEFENDANT KENNETH ENGLAND

Please take notice that at the time, date, and place designated below, Plaintiff Audrey Cox will take the testimony upon oral examination of the deponent named herein. The deposition will continue from day to day until completed. Such deposition shall be taken for the purpose of discovery or for use as evidence in this action or both and shall be taken before a notary public, court reporter, or other person who is legally authorized to administer oaths. Testimony will be recorded by stenographic means and by video recording. The deposition may also be conducted by way of video conference.

DATE OF DEPOSITION: June 5, 2023

TIME OF DEPOSITION: 9:00 a.m.

DEPONENT: Kenneth England

PLACE OF DEPOSITION: DiCello Levitt LLC

505 20th St. North, Suite 1500 Birmingham, AL 35203

Respectfully submitted,

/s/Diandra S. Debrosse Zimmermann

Diandra S. Debrosse Zimmermann (ASB-2956-N76D) Eli J. Hare (ASB-1024-T20Q)

DICELLO LEVITT LLC

505 20th St. North, Suite 1500 Birmingham, AL 35203 fu@dicellolevitt.com ehare@dicellolevitt.com

Kenneth P. Abbarno*
Justin Hawal*
DICELLO LEVITT LLC
Western Reserve Law Building
7556 Mentor Ave.
Mentor, OH 44060
kabbarno@dicellolevitt.com

Counsel for Plaintiff

*Admitted Pro Hac Vice

jhawal@dicellolevitt.com

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of April 2023, I served a copy of the foregoing by electronical mail to:

James C. Pennington, Esq.
Amy Quick Glenos, Esq.
OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.
420 20th Street North, Suite 1900
Birmingham, AL 35203
james.pennington@ogletree.com
amy.glenos@ogletree.com

Counsel for Defendants, Spring Hill College, J.K. Anderson, Kenneth England, E. Joseph Lee, II, and Kevin W. Abel

Heather M. Houston, Esq. Christopher Scott Williams, Esq. HAND ARENDALL HARRISON SALE LLC P.O. Box 1499 Fairhope, AL 36532 hhouston@handfirm.com cwilliams@handfirm.com Counsel for Defendant, Vassil Kokali

/s/ Diandra S. Debrosse Zimmermann
Diandra S. Debrosse Zimmermann (ASB-2956-N76D)
Counsel for Plaintiff